

DOCKET NO.: 698162.0005

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner

v.

VINDOLOR, LLC,
Patent Owner

IPR2019-00478
Patent 6,213,391

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,213,391
CHALLENGING CLAIMS 1-2
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

CONTENTS

I.	Introduction.....	1
II.	Mandatory Notices, Standing, and Fees	1
	Real Party-In-Interest.....	1
	Related Matters.....	1
	Lead and Backup Counsel	3
	Service Information	3
	Certification of Grounds for Standing.....	3
	Fees	4
III.	Invalidity Grounds.....	4
IV.	The Board Should Not Deny This Petition Under 35 U.S.C. §	
	325(d).....	5
V.	Technology Background.....	6
VI.	U.S. 6,213,391	7
	A. Summary	7
	B. Level of Ordinary Skill in the Art	20
	C. Claim Construction	21
VII.	The Challenged Claims are Unpatentable	26
	A. GROUND 1: Gullman anticipates Claims 1 and 2	26
	1. Overview of Gullman	26
	2. Independent Claim 1	30
	3. Dependent Claim 2	44
	B. GROUND 2: Gullman in view of the knowledge of a POSITA	
	renders obvious Claims 1 and 2	45
	1. Independent Claim 1	45
	2. Dependent Claim 2	48
	C. GROUND 3: Lane in view of Drexler renders obvious Claims 1	
	and 2	49
	1. Overview of Lane.....	49
	2. Overview of Drexler	54
	3. Drexler and Lane are Analogous Art	60
	4. Rationales to Combine Lane and Drexler.....	61
	5. Independent Claim 1	65
	6. Dependent Claim 2	80
VIII.	Conclusion	82

EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 6,213,391 (the “’391 Patent”)
1002	Declaration of Dr. Creed Jones
1003	Petitioner’s Voluntary Interrogatory Responses
1004	U.S. Patent No. 5,280,527 (“Gullman”)
1005	U.S. Patent No. 5,623,552 (“Lane”)
1006	U.S. Patent No. 5,457,747 (“Drexler”)
1007	File History for the ’391 Patent

I. INTRODUCTION

Petitioner Unified Patents Inc. (“Unified” or “Petitioner”) requests *inter partes* review (“IPR”) of claims 1-2 of U.S. Patent No. 6,213,391 (the “’391 Patent”). (Ex-1001).

The challenged claims are unpatentable based on the disclosures in at least the references presented in this Petition and as supported by the declaration of Dr. Creed Jones.

II. MANDATORY NOTICES, STANDING, AND FEES

Real Party-In-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that Unified is the real party-in-interest, and further certifies that no other party exercised control or could have exercised control over Unified’s participation in this proceeding, the filing of this petition, or the conduct of any ensuing trial. In view of *Worlds Inc. v. Bungie, Inc.*, 903 F.3d 1237, 1242-44 (Fed. Cir. 2018), Unified has submitted voluntary discovery in support of its certification. (*See* Ex-1003).

Related Matters

Petitioner is aware of the following cases involving the ’391 Patent:

- *Vindolor, LLC v. Petco Animal Supplies*, 2:18-cv-00481 (E.D. Tex.);
- *Vindolor, LLC v. Discount Tire Company of Texas, Inc.*, 2:18-cv-00480 (E.D. Tex.);

- *Vindolor, LLC v. Spec's Family Partners, Ltd.*, 6:18-cv-00107 (W.D. Tex.);
- *Vindolor, LLC v. Retail Services & Systems, Inc.*, 6:18-cv-00108 (W.D. Tex.);
- *Vindolor, LLC v. Euromarket Designs Inc.*, 6:18-cv-00105 (W.D. Tex.);
- *Vindolor, LLC v. Trader Joe's East, Inc.*, 2:18-cv-00482 (E.D. Tex.);
- *Vindolor, LLC v. Restoration Hardware, Inc.*, 2:18-cv-00373 (E.D. Tex.);
- *Vindolor, LLC v. NTW, LLC d/b/a National Tire and Battery*, 2:18-cv-00374 (E.D. Tex.);
- *Vindolor, LLC v. Disney Store USA, LLC*, 2:18-cv-00375 (E.D. Tex.);
- *Vindolor, LLC v. Hat World, Inc.*, 2:18-cv-00187 (E.D. Tex.); and
- *Vindolor, LLC v. Buc-ee's, Ltd.*, 6:18-cv-00104 (W.D. Tex.).

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